



Your business
is our business.

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Greenbelt, Maryland 20770
phone: 301-459-7590, fax: 301-577-5575
internet: www.jsitel.com, e-mail: jsi@jsitel.com

REDACTED - FOR PUBLIC INSPECTION

June 24, 2015

Via Hand Delivery

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

ACCEPTED/FILED

JUN 24 2015

Federal Communications Commission
Office of the Secretary

Re: WC Docket No. 14-58
2015 ETC Annual Report of Tri-County Telephone Association Inc. & TCT
West, Inc. (WY)
Study Area Code 512296

Dear Ms. Dortch:

On behalf of Tri-County Telephone Association Inc. & TCT West, Inc. (WY) ("Tri-County"), JSI files the attached confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules.¹ Tri-County seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.² The redacted version is also being filed this date via the FCC's Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under Sections 0.457 and 0.459 of its Progress Report on its Five-Year Service Quality Improvement Plan as required by Section 54.313(a)(1).³

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

cc: Charles Tyler, Telecommunications Access Policy Division (two copies, confidential)

¹ 47 C.F.R. §§ 54.313, 54.422.

² *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Protective Order, DA 15-712 rel. June. 17, 2015 (Protective Order). 47 C.F.R. § 54.313(f)(2).

³ 47 C.F.R. §§ 0.457, 0.459, 54.313(a)(1).

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1380 Corporate Center Curve, Eagan, MN 55121
phone: 651-452-2660, fax: 651-452-1909

6849 Peachtree Dunwoody Road
Bldg. B-3, Suite 200, Atlanta, GA 30328
phone: 770-569-2105, fax: 770-410-1608

547 South Oakview Lane
Bountiful, UT 84010
phone: 801-294-4576, fax: 801-294-5124



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Federal Communications Commission
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Marlene H. Dortch, Secretary
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445 12th Street, SW
Washington, DC 20554

Re: **WC Docket No. 14-58**
2015 ETC Annual Report of Tri-County Telephone Association Inc. & TCT
West, Inc. (WY)
Study Area Code 512296
Request for Confidentiality

Dear Ms. Dortch:

John Staurulakis, Inc. ("JSI"), on behalf of its client Tri-County Telephone Association Inc. & TCT West, Inc. (WY) ("Company") hereby requests, pursuant to Sections 0.457 and 0.459 of the Commission's rules,¹ withholding from public inspection certain information contained in an attachment to the above referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).²

1. The information for which the Company is seeking confidential treatment is an attachment to the Company's annual reporting information pursuant to Sections 54.313 and 54.422 of the Commission's rules ("Report").³
2. Pursuant to Section 54.313(a)(1), Rate-of-Return Eligible Telecommunications Carriers ("ETCs") must file with the Commission a Progress Report on its Five-Year Service Quality Improvement Plan ("Progress Report") which is contained in the attachment to the 2015 Report.⁴
3. The information contained in attachment for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment. Information of this nature is confidential commercial information routinely withheld from public inspection.

¹ 47 C.F.R. §§ 0.457, 0.459.

² 47 C.F.R. § 0.459(b)(1) through (9).

³ 47 C.F.R. §§ 54.313, 54.422.

⁴ 47 C.F.R. §§ 54.313(a)(1).

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547 South Oakview Lane
Bountiful, UT 84010
phone: 801-294-4576, fax: 801-294-5124

4. With respect to identifying the degree to which the subject attachment concerns a service that is subject to competition, the information is of a financial and competitive nature regarding the provision of telecommunications services. The Line 112 attachment contains competitively sensitive information related to proposed improvements or upgrades and maintenance the Company's network.

In its *March 5, 2013 Order*, the FCC. The FCC specified that for rate-of-return carriers, the five-year plans "should describe the carrier's network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories."⁵ The Company's Progress Report updates this information as well as provides maps and detailed information as to whether or not network improvement objectives were achieved at the wire center level. Accordingly, because the Company is a rate-of-return carrier, it must file Progress Reports which contain proprietary, competitively sensitive information related to the Company's existing network including the specific locations of customers as well as describe proposed improvements or upgrades and maintenance of its network throughout its service area. Specifically, this information sets forth services provided by the Company over its existing network including specific locations of customers as well as planned network improvement and maintenance for the years 2015 through 2019 including project start and completion dates, population that will be impacted by the improvements and upgrades at the wire center level and projected capital costs associated with the improvements and upgrades and operating costs associated with maintaining the network including depreciation for investments that have already been made. As such, this information contains competitively sensitive information related to the Company's existing network as well as detailed plans at the wire center level for network upgrades and maintenance projected for the years 2015 through 2019.

5. With respect to identifying possible exposure to competitive harm, the information contained in the Line 112 attachment is information that is not customarily released to the public. This information is proprietary to the Company, is unique to the Company's serving territory and is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to potential competitors who would be able to target their marketing to specific customers. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company's customers which would place the Company at a competitive disadvantage.

⁵ See *Connect America Fund et al.*, WC Docket 10-90 *et al.*, Order, DA 13-332 (rel. Mar. 5, 2013) ("*March 5, 2013 Order*") at para 9 citing Section 54.202(a) (1) (ii).

6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachment, the Company is filing the attachment under seal. The Company uses the information contained in the Five-Year Plan to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the Company has been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.
7. Any previous versions of this information are not publicly available.
8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
9. Not applicable.

Based on the preceding, JSI respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment.

Please contact the undersigned with any questions regarding this request.

Sincerely,



John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

<010> Study Area Code 512296
 <015> Study Area Name TRI-COUNTY TELEPHONE ASSOCIATION, INC.
 <020> Program Year 2016
 <030> Contact Name: Person USAC should contact with questions about this data Steven C. Harper
 <035> Contact Telephone Number: 3075682427 ext. Number of the person identified in data line <030>
 <039> Contact Email Address: steve.harper@tctstaff.com Email of the person identified in data line <030>

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JUN 24 2015

Federal Communications Commission
Office of the Secretary

ANNUAL REPORTING FOR ALL CARRIERS

		54.330 Completion Required	54.422 Completion Required
<100>	Service Quality Improvement Reporting (complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<200>	Outage Reporting (voice) (complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210>	<input checked="" type="checkbox"/> <-- check box if no outages to report	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<300>	Unfulfilled Service Requests (voice) 0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<310>	Detail on Attempts (voice) (attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<320>	Unfulfilled Service Requests (broadband) 0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<330>	Detail on Attempts (broadband) (attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<400>	Number of Complaints per 1,000 customers (voice)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<410>	Fixed 0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420>	Mobile 0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<430>	Number of Complaints per 1,000 customers (broadband)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<440>	Fixed 0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<450>	Mobile 0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<500>	Service Quality Standards & Consumer Protection Rules Compliance (check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510>	512296wy510.pdf (attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600>	Functionality in Emergency Situations (check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610>	512296wy610.pdf (attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700>	Company Price Offerings (voice) (complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<710>	Company Price Offerings (broadband) (complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<800>	Operating Companies and Affiliates (complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900>	Tribal Land Offerings (Y/N)?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1000>	Voice Services Rate Comparability Certification (if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1010>	512296wy1000.pdf (attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1100>	Certify whether terrestrial backhaul options exist (Yes or No) (if not, check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1110>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1200>	Terms and Condition for Lifeline Customers (complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<2005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

<3000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

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**(100) Service Quality Improvement Reporting
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	512296
<015>	Study Area Name	TRI-COUNTY TELEPHONE ASSOCIATION, INC.
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Steven C. Harper
<035>	Contact Telephone Number - Number of person identified in data line <030>	3075682427 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	steve.harper@tctstaff.com

(yes / no) ☐ ☒

(yes / no) ☐ ☐

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

512296WY112.pdf

Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

<113>	Maps detailing progress towards meeting plan targets
<114>	Report how much universal service (USF) support was received
<115>	How much (USF) was used to improve service quality and how support was used to improve service quality
<116>	How much (USF) was used to improve service coverage and how support was used to improve service coverage
<117>	How much (USF) was used to improve service capacity and how support was used to improve service capacity
<118>	Provide an explanation of network improvement targets not met in the prior calendar year.

Yes
Yes
Yes
Yes
Yes
Not Applicable

Yes
Yes
Yes
Yes
Yes
Not Applicable

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**(200) Service Outage Reporting (Voice)
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0985/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	512296
<015>	Study Area Name	TRI-COUNTY TELEPHONE ASSOCIATION, INC.
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Steven C. Harper
<035>	Contact Telephone Number - Number of person identified in data line <030>	3075682427 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	steve.harper@tctastaff.com

[illegible]

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(700) Price Offerings Including Voice Rate Data
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	512296
<015>	Study Area Name	TRI-COUNTY TELEPHONE ASSOCIATION, INC.
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Steven C. Harper
<035>	Contact Telephone Number - Number of person identified in data line <030>	3075682427 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	steve.harper@tctstaff.com

<701>	Residential Local Service Charge Effective Date	1/1/2015
<702>	Single State-wide Residential Local Service Charge	

[illegible]

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(710) Broadband Price Offerings Data Collection Form FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	512296
<015>	Study Area Name	TRI-COUNTY TELEPHONE ASSOCIATION, INC.
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Steven C. Harper
<035>	Contact Telephone Number - Number of person identified in data line <030>	3075682427 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	steve.harper@tctstaff.com

[illegible]

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(800) Operating Companies
Data Collection Form

ECC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	512296
<015>	Study Area Name	TRI-COUNTY TELEPHONE ASSOCIATION, INC.
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Steven C. Harper
<035>	Contact Telephone Number - Number of person identified in data line <030>	3075682427 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	steve.harper@tctstaff.com
<810>	Reporting Carrier	Tri County Telephone Association, Inc
<811>	Holding Company	BHT Holdings
<812>	Operating Company	Tri County Telephone Association, Inc

[illegible]

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(900) Tribal Lands Reporting
Data Collection Form

FCC Form 481
OMB Control No. 3060-0985/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	512296
<015>	Study Area Name	TRI-COUNTY TELEPHONE ASSOCIATION, INC.
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Steven C. Harper
<035>	Contact Telephone Number - Number of person identified in data line <030>	3075682427 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	steve.harper@tcta.org

<910> Tribal Land(s) on which ETC Serves

Wind River Reservation

<920> Tribal Government Engagement Obligation

512296WY920.pdf

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

[illegible]

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(1100) No Terrestrial Backhaul Reporting
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	512296
<015>	Study Area Name	TRI-COUNTY TELEPHONE ASSOCIATION, INC.
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Steven C. Harper
<035>	Contact Telephone Number - Number of person identified in data line <030>	3075682427 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	steve.harper@tctstaff.com

<1120> Please confirm whether terrestrial backhaul options exist within the supported area pursuant to § 54.313(g) (Yes, No).

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

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(1200) Terms and Condition for Lifeline Customers
Lifeline
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	512296
<015>	Study Area Name	TRI-COUNTY TELEPHONE ASSOCIATION, INC.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Steven C. Harper
<035>	Contact Telephone Number - Number of person identified in data line <030>	3075682427 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	steve.harper@tctstaff.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP <http://www.tctwest.net/lovell-inside-city/residential/telephone/>

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ☒

<1222> Details on the number of minutes provided as part of the plan, ☒

<1223> Additional charges for toll calls, and rates for each such plan. ☒

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(2000) Price Cap Carrier Additional Documentation

Data Collection Form

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

PCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	512296
<015>	Study Area Name	
<020>	Program Year	TRI-COUNTY TELEPHONE ASSOCIATION, INC.
<030>	Contact Name - Person USAC should contact regarding this data	2016
<035>	Contact Telephone Number - Number of person identified in data line <030>	Steven C. Harper
<039>	Contact Email Address - Email Address of person identified in data line <030>	3075662427 ext.
		steve.harper@tccstaff.com

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

- <2010> 2nd Year Certification {47 CFR § 54.313(b)(1)i}
- <2011a> 3rd Year Certification {47 CFR § 54.313(b)(1)ii}
- <2011b> Attachment {47 CFR § 54.313(b)(1)ii}

Name of Attached Document(s) Listing Required Information

Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}

- <2012> 2013 Frozen Support Calculation {47 CFR § 54.313(c)(1)}
- <2013> 2014 Frozen Support Calculation {47 CFR § 54.313(c)(2)}
- <2014> 2015 Frozen Support Calculation {47 CFR § 54.313(c)(3)}
- <2015> 2016 and future Frozen Support Calculation {47 CFR § 54.313(c)(4)}

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

- <2016> Certification Support Used to Build Broadband
- Connect America Phase II Reporting {47 CFR § 54.313(e)}
- <2017> 3rd year Broadband Service Certification
- <2018> 5th year Broadband Service Certification
- <2019> Interim Progress Certification
- <2020> Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

- <2021> Interim Progress Community Anchor Institutions

Name of Attached Document(s) Listing Required Information

REDACTED - FOR PUBLIC INSPECTION

(3008) Rate Of Return Carrier Additional Documentation

Data Collection Form

PCC Form 841

DATE COLLECTED: 3060-0808/0808/0808 No. 3060-0819

July 2013

<010> Study Area Code 512296
 <015> Study Area Name TRI-COUNTY TELEPHONE ASSOCIATION, INC.
 <020> Program Year 2016
 <030> Contact Name - Person USAC should contact regarding this data Steven C. Harper
 <035> Contact Telephone Number - Number of person identified in data line <030> 3075682427 ext.
 <039> Contact Email Address - Email Address of person identified in data line <030> steve.harper@tctstaff.com

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3010) Progress Report on 5 Year Plan
 Milestone Certification (47 CFR § 54.313(f)(1)(i))

512296wy100A.docx

Name of Attached Document Listing Required Information

(3011) Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year. ☐

(3012) Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))

Name of Attached Document Listing Required Information

(3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))

(Yes/No) ☒ Yes ☐ No

(3014) If yes, does your company file the RUS annual report

(Yes/No) ☒ Yes ☐ No

Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers) ☐

(3016) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows ☐

(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

Name of Attached Document Listing Required Information

(3018) If the response is no on line 3014, Is your company audited?

(Yes/No) ☒ Yes ☐ No

If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains

(3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications ☒

(3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows ☒

(3021) Management letter and audit opinion issued by the independent certified public accountant that performed the company's financial audit ☒

If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

(3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers, ☐

(3023) Underlying information subjected to a review by an independent certified public accountant ☐

(3024) Underlying information subjected to an officer certification. ☐

(3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows ☐

12-31-14 TCTA Financial Statements.pdf, 12-31-14 TCTA Board Letter.pdf

(3026) Attach the worksheet listing required information

Name of Attached Document Listing Required Information

REDACTED - FOR PUBLIC INSPECTION

(3900) Rate Of Return Carrier Additional Documentation (Continued)		REC Form 483
Data Collection Form		Call Center No. 3050-0004/DWS Control No. 3050-0019
		July 2013

<010> Study Area Code	512296
<015> Study Area Name	TRI-COUNTY TELEPHONE ASSOCIATION, INC.
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Steven C. Harper
<035> Contact Telephone Number - Number of person identified in data line <030>	3075682427 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	steve.harper@tctstaff.com

Financial Data Summary

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

(3030) Telephone Plant In Service(TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends

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Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0985/OMB Control No. 3060-0813 July 2013
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<010> Study Area Code	512296
<015> Study Area Name	TRI-COUNTY TELEPHONE ASSOCIATION, INC.
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Steven C. Harper
<035> Contact Telephone Number - Number of person identified in data line <030>	3075682427 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	steve.harper@tctstaff.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier: TRI-COUNTY TELEPHONE ASSOCIATION, INC.	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer: Steven Harper	
Title or position of Authorized Officer: CFO	
Telephone number of Authorized Officer: 3075682427 ext.	
Study Area Code of Reporting Carrier: 512296	Filing Due Date for this form: 07/01/2015
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

REDACTED - FOR PUBLIC INSPECTION

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0936/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	512296
<015> Study Area Name	TRI-COUNTY TELEPHONE ASSOCIATION, INC.
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Steven C. Harper
<035> Contact Telephone Number - Number of person identified in data line <030>	3075682427 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	steve.harper@tctstaff.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent: _____	
Name of Reporting Carrier: _____	
Signature of Authorized Officer: _____	Date: _____
Printed name of Authorized Officer: _____	
Title or position of Authorized Officer: _____	
Telephone number of Authorized Officer: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier: _____	
Name of Authorized Agent or Employee of Agent: _____	
Signature of Authorized Agent or Employee of Agent: _____	Date: _____
Printed name of Authorized Agent or Employee of Agent: _____	
Title or position of Authorized Agent or Employee of Agent: _____	
Telephone number of Authorized Agent or Employee of Agent: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

REDACTED - FOR PUBLIC INSPECTION

(700) Price Offerings including Voice Rate Data
Data Collection Form

ECC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	512296
<015>	Study Area Name	TRI-COUNTY TELEPHONE ASSOCIATION, INC.
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Steven C. Harper
<035>	Contact Telephone Number - Number of person identified in data line <030>	5017485390 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	steve.harper@tctstaff.com

<701> Residential Local Service Charge Effective Date
<702> Single State-wide Residential Local Service Charge

1/1/2015

<703>

[illegible]

REDACTED - FOR PUBLIC INSPECTION

(710) Broadband Price Offerings
Data Collection Form

FCC Form 481
OMB Control No. 3060-0988/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	512296
<015>	Study Area Name	TRI-COUNTY TELEPHONE ASSOCIATION, INC.
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Steven C. Harper
<035>	Contact Telephone Number - Number of person identified in data line <030>	5017485390 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	steve.harper@tctstaff.com

[illegible]

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ATTACHMENT - LINE 112

**Five-Year Network Improvement Plan and
Progress Report**

ATTACHMENT REDACTED IN ENTIRETY

Certification for Tri County Telephone Association, Inc

1. Demonstration of complying with applicable service quality standards and consumer protection rules:

In establishing this certification in its *2005 ETC Order*,¹ the FCC found that an ETC must make "a specific commitment to objective measures to protect consumers."² The Commission found that for wireless ETCs, compliance with CTIA's Consumer Code for Wireless Service would satisfy this requirement" and that the sufficiency of other commitments would be considered on a case-by-case basis.³ In this context, the FCC stated, "to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement."⁴

Tri County Telephone Association, Inc. ("Company") hereby certifies that it is complying with applicable service quality standards and consumer protection rules. The Company is subject to consumer protection obligations under state law. These obligations include, but are not limited to, the following: (1) filing a Local Exchange Tariff pursuant to the requirements of **the Wyoming PSC** which disclose rates, terms and conditions of service to customers; (2) adherence to state consumer protection requirements governing telephone providers which require adherence to extensive quality

¹ *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) ("*2005 ETC Order*").

² *Id.* at para. 28.

³ *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: "(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy." *Id.* at n. 71.

⁴ *Id.* at n. 72.

of service reporting rules including held orders, repetitive repair visits, complaints per 1,000 customer reporting, network testing processes. In addition the company adheres to, service outage reporting rules, immediate complaint resolution standards, federal "cramming" requirements, emergency service preparedness standards, including generator and battery backup, traffic re-routing and spike management rules "C.F.R. §54.202(a)(2), and 911 redundancy standards. (3) truth-in-billing requirements; and (4) CPNI, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

The Company is subject to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C 47 C.F.R Part 8 §8.3.

Certification for Tri County Telephone Association, Inc.

Ability to Function in Emergency Situations

The Company hereby certifies that it is able to function in emergency situations as set forth in §54.201(a)(2).¹ The Company's voice and broadband network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically, each central office building is supplied with standby generators and battery back-up that enable the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic. The Company has battery backup at all office locations and in its electronic equipment sites. Length of run time is determined by the equipment serving the area and the number of customers working out of the equipment. Generators are installed at all Central Office locations. They will continue to run as long as the Company has access to the appropriate fuel.

¹ Section 54.201(a)(2) requires ETCs that are designated by the Commission to "demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations."

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[illegible]

THE PROVISION OF SERVICE ON TRIBAL LANDS

TRIBAL GOVERNMENT ENGAGEMENT OBLIGATIONS

Tri county Telephone Association, Inc. (TCT) provides telecommunications services on a small portion of the Wind River Reservation. By far, the greatest portion of the Reservation lies south of the Owl Creek Mountains; however, a small part of the Reservation lies north of the Mountains and TCT's Hamilton Dome exchange, and crosses a small section of the latter northern area. Further, in 1910, the area served by TCT was opened for homesteading through issuance of land patents by the federal government further reducing the extent of Reservation land.

The remaining Native American enterprise is the Arapahoe Ranch containing ranch offices and three residences all of which are served by private line (special access) provided by CenturyLink from tribal headquarters in Fort Washakie, Wyoming. TCT provides the terminating link for the circuit.

TCT regularly conducts house-to-house surveys in the area in search of newly arrived Native American members of the Eastern Shoshone and Northern Arapahoe tribes. The intent is to provide service and to assist with the telecommunications benefits provided by the federal government through programs offered by the Federal Communications Commission. The most recent survey was conducted early in 2013 and, as with previous surveys, no Native Americans were located. As a consequence, TCT does not serve any Native Americans, except as noted above (the special access end link to the Arapahoe Ranch).

TCT takes the obligation to serve this part of the Reservation seriously and will continue surveys in the area to ensure service is offered when newly arrived Native Americans are located.

In terms of needs assessment and deployment planning, there are no Tribal community anchor institutions located in this area of the reservation. Further, there has been no requirement for feasibility and sustainability planning because TCT has placed high capacity fiber optic cable to within a very short distance of every location within the area providing high bandwidth service availability to everyone. The capability of the fiber is such that the existing level of service as well as future demand will be available to all residing or conducting business in the area.

Because Tribal Headquarters lie outside the TCT service territory and there are no anchor institutions located in the area, TCT has not needed to market enterprise services; however all employees are aware of our service obligations to Native Americans and if and when telecommunications services are needed, they are prepared to be culturally sensitive.

TCT has obtained permission from the Bureau of Indian Affairs to place cable along the road rights-of-way in the area and will continue to do so when required. The same applies to meeting all Land Use requirements and environmental Review processes when and wherever required. TCT provides fiber service in this area and does not now nor does it plan to provide wireless service; accordingly, Facilities Siting rules do not apply.

TCT subscribes to the Department of the Interior website and to local publications to remain aware of all matters affecting tribal culture as well as events TCT can attend to remain aware of Reservation life and the culture of its Native American neighbors.

Even through the provision of service by TCT is limited, the Company is aware of its obligations and will continue its outreach to ensure compliance with all requirements and its continuing commitment to the provision of high quality telecommunication services in the area to all existing and future residents and enterprises.

Public Notice DA 14-384, released March 20, 2014 in WC Docket No. 10-90 established a voice service rate floor of \$20.46 and a reasonable comparability benchmark of \$46.96. Further, the Seventh Order on Reconsideration, FCC 14-54A1, released June 10, 2014, provided for a rate floor phase-in allowing rates of \$16.00 during the period of January 2, 2015 through June 30, 2016. The respondent's regulated local exchange tariff rates range from \$16.00 to \$45.08; consequently, no rate is below the phase-in rate floor nor above the reasonable comparability benchmark. Finally, Wyoming statute requires that no consumer pays more than 130% of the Wyoming statewide average rate which is currently \$28.21 to be effective July 1, 2015; accordingly, where tariff rates exceed that amount, a discount is applied.

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ATTACHMENT - LINE 3026

ATTACHMENT REDACTED IN ENTIRETY